

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

IBN WILLIAMS,

Plaintiff,

v.

COPPIN STATE UNIVERSITY, *et al.*,

Defendants.

*

*

*

No. 1:23-cv-02590-JRR

*

*

* * * * *

**RESPONSE TO REQUEST FOR GUIDANCE REGARDING DEPOSITION
SCHEDULING AND DISCOVERY END DATE**

Defendants Coppin State University, University System of Maryland, State of Maryland, Derek Carter, and Juan Dixon (together, “State Defendants”), submit this response to plaintiff Ibn Williams’s request for guidance regarding deposition scheduling and discovery end date (ECF No. 73) and state as follows:

1. Plaintiff filed a motion to extend the discovery deadline after the close of discovery, which the State Defendants and defendant Brownlee opposed.
2. On October 17, 2025, Magistrate Judge Miller issued an order that discovery be extended through December 5 to allow plaintiff to take depositions (ECF No. 67). Defendants were ordered to provide two dates for each witness that plaintiff wanted to depose and plaintiff must select one of the two dates. Judge Miller ordered the following schedule, in relevant part:
 - a. Discovery deadline – December 5, 2025
 - b. Any supplement to Defendant’s Expert Report(s) occasioned by Deposition Testimony taken after October 17, 2025 – January 9, 2026.
 - c. Submission of Joint Status Report – January 9, 2026.
 - d. Requests for Admission – January 16, 2026.
 - e. Dispositive Motions Deadline – February 9, 2026.

3. It has been and remains very challenging to schedule the depositions of numerous witnesses given the schedules of the deponents, the attorneys for the State Defendants, and the attorney for defendant Brownlee. One of the witnesses is not available until January 2026, and could not provide two dates before January 2026.
4. Therefore, State Defendants consent to an extension of the discovery deadline until January 30, 2025, and a corresponding extension of the other deadlines.
5. After the deposition of Dr. Lisa Early was confirmed for November 25, plaintiff's counsel requested that we provide a third possible date because plaintiff's counsel's firm had a holiday party scheduled on the afternoon of November 25. State Defendants opposed postponing her deposition because there appeared to be almost no dates on which Dr. Early and counsel for defendant Brownlee were both available. After conferring with both, however, State Defendants found that Dr. Early and counsel for defendant Brownlee were both available on January 8. The parties have now agreed that Dr. Early's deposition will take place on January 8. Therefore, plaintiff's second request for guidance regarding Dr. Early's deposition is now moot.

Respectfully submitted,

ANTHONY G. BROWN
Attorney General of Maryland

/s/ Kathryn J. Bradley
ARIEL LICHTERMAN
Federal Bar No. 20850
KATHRYN J. BRADLEY
Federal Bar No. 21242
Assistant Attorney General
Office of the Attorney General
200 St. Paul Place, 17th Floor
Baltimore, Maryland 21202-2021

Tel: (410) 576-6449

Fax: (410) 576-6437

kbradley@oag.state.md.us

alichterman@oag.state.md.us

*Attorneys for Defendants Coppin State University,
University System of Maryland, State of Maryland,
Derek Carter, and Juan Dixon*

CERTIFICATE OF SERVICE

I certify that, on this 19th day of November 2025, the foregoing was served by CM/ECF
on all counsel of record.

/s/ Kathryn J. Bradley

Kathryn J. Bradley